

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:16CR143
)	
MOHAMAD JAMAL KHWEIS)	The Honorable Liam O’Grady
)	
Defendant.)	

DEFENDANT’S REQUESTED VOIR DIRE

Comes now the Mohamad Khweis by and through his counsel and respectfully requests that this Honorable Court pose the following questions to the prospective jurors:

1. Employment Bias

- a. Has anyone ever been employed by **a law enforcement agency** or applied to one for employment? Is so which one and when.
- b. Has anyone had a close relative or friend been employed by Federal Government a law enforcement agency. If so which one and when and your relationship to that person;
- c. Has anyone ever been employed by the **Federal Government** applied to it for employment? Is so which agency and when.
- d. Has anyone had a close relative or friend been employed. If so which one and when and your relationship to that person;

- e. Has anyone ever been a member of the armed services or attempted to join it? If so which branch.
- f. Does anyone have a close friend or relative serving in the armed services? If so your relationship and which branch.
- g. Would anyone tend to believe a Law enforcement officer over that of an ordinary person because of that person's status as a Law enforcement officer;
- h. Would anyone tend to believe an employee of the Federal Government over that of an ordinary person because of that person's status as a member of the Armed Services ;
- i. Would anyone tend to believe an employee of the State Department over that of an ordinary person because that person status as an employee of the Federal Government.

2. Religious Bias

- a. Does anyone have a negative view of ISLAM?**
 - i. Does anyone associate Islam with violence?**
 - ii. Does anyone associate Islam with Terrorism?**
- b. Does anyone have a negative view of Muslims?**

3. ISIS or Terrorism

- a. Has anyone been directly affected by an act of terrorism? If so explain.
- b. Has anyone had a close friend or relative affected by an act of terrorism? If so explain;

4. Belief in the First Amendment.

- a. Does anyone not believe that a United states Citizen should have the freedom
 - i. to travel,
 - ii. to associate
 - iii. speak
 - iv. obtain knowledge though books, newspapers, the internet and personal exploration?

5. Concluding question.

– the defendant, Mr. Khweis is charged with providing material support to a terrorist organization. In this case ISIS:

(AFTER INSTRUCTING THEM ON BURDEN OF PROOF AND PRESUMPTION OF INNOCENCE)

- a. Does anyone here feel so strongly about ISIS or terrorism that even before the trial begins you lean toward convicting Mr. Khweis;
- b. If at the end of the trial you are left with the belief that Mr. Khweis is probably guilty but have a reasonable doubt about his guilt, would any of you hesitate to find him not guilty;

6.

7. CONCLUSION

In order to assist the defendant to obtain a fair and unbiased jury Mr.

Khweis respectfully requests this honorable Court to ask the above listed questions.

Respectfully submitted,

MOHAMAD KHWEIS
By Counsel

/s/
Jessica N. Carmichael, Esq.
Virginia Bar No. 78339
HARRIS & CARMICHAEL, PLLC
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
(703) 684-7908
jcarmichael@harriscarmichael.com

/s/

John K. Zwerling, Esq.
Virginia Bar No. 8201
ZWERLING/CITRONBERG, PLLC
114 N. Alfred Street
Alexandria, VA 22314

703-684-8000

703-684-9700 (F)

Email: jz@zwerling.com

CERTIFICATE OF SERVICE

I, hereby certify, that on the 23rd day of May, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following and all parties to this action:

Dennis Fitzpatrick, Esq.
United States Attorney's Office
2100 Jamieson Ave
Alexandria, VA 22314
(703) 299-3954
Email: dennis.fitzpatrick@usdoj.gov

Raj Parekh, Esq.
US Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
703-299-3700
Email: raj.parekh@usdoj.gov

Colleen Garcia, Esq.
US Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
703-299-3700
Email: colleen.e.garcia@usdoj.gov

_____/s/_____
John Kenneth Zwerling, Esq.